

COUNTY OF SANTA BARBARA

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April 17, 2018

Hearing Board
Santa Barbara County Air Pollution Control District
c/o Lyz Hoffman, Acting Clerk of the Board
260 N. San Antonio Rd., Suite A
Santa Barbara, CA. 93110

Re: Air Resources Board letter, March 13, 2018, re Wine Institute Appeal; Case No.'s 2017-21-AP and 2017-24-AP;

Honorable Board members,

On March 13, 2018, the Air Resources Board submitted a letter to your Board, including a "Technical Support Attachment," that provided detailed comments and analysis regarding the above encaptioned appeal. As stated in the District memorandum attached to this letter, the District Engineering Division concurs with the Air Resources Board's analysis and conclusions.

The Control Officer stresses the importance of this particular comment letter as the Air Resources Board is the oversight agency for all air pollution control and air quality management districts in California. (See Health & Saf. Code §§41650-41652.) As part of its responsibilities, the Air Resource Board staff maintains the "state clearinghouse" list of Best Available Control Technologies for all sources of air pollution subject to permit by the districts. It is the Air Resources Board staff that determines whether a particular technology qualifies as BACT. In this particular case, the Board staff concluded the NoMoVo and EcoPAS systems are Best Available Control Technology for wineries because these technologies have been achieved in practice.

Finally, the District appreciates the Air Resources Board's thorough description on how Best Available Control Technology should be determined in any particular case. (See ARB letter at pp. 2 -6.) In sum, the Air Resources Board letter is extremely insightful and helpful to evaluating the appeal.



Sincerely,

William M. Dillon, Senior Deputy
Santa Barbara County Counsel's Office
Attorney for Air Pollution Control Officer

cc: Morgan Gilhuly

MEMORANDUM

TO: William Dillon, Senior Deputy County Counsel

FROM: Michael Goldman, Manager, Engineering Division 
David Harris, Supervisor, Engineering Division 

SUBJECT: District's Analysis of CARB Submittal Regarding Hearing Board Case
Nos. 2017-21-AP and 2017-24-AP

DATE: April 9, 2018

The District's Engineering Division has reviewed the letter and attachment, dated March 13, 2018, submitted by the California Air Resources Board in support of the District's position in Hearing Board Case Nos. 2017-21-AP and 2017-24-AP. The District's Engineering Division concurs with the technical analyses provided by the Air Resources Board in their letter and their *Technical Support Attachment*.